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June 27, 2024

Re: *In re Purdue Pharma L.P., et al.* (Case No. 19-23649) – Request for Status Conference

The Honorable Sean H. Lane
United States Bankruptcy Court
300 Quarropas Street
White Plains, NY 10601-4140

Dear Judge Lane and Chambers:


In light of the recent decision of the Supreme Court in the above referenced case, and as Your Honor previously suggested, we submit this letter formally to request a public on-the-record status conference before Your Honor pursuant to Your rules and Section 105 of the Bankruptcy Code to discuss the path forward. To be prepared for various eventualities, permutations of the Debtors and key stakeholders have had extensive discussions in recent weeks in anticipation of the potential decision, and we (and undoubtedly others) would like to discuss the way forward with the Court.

As Your Honor is likely aware, Judge Drain previously ordered several rounds of mediation in this case without formal motion, describing such mediations as an “outgrowth of the phase one mediation.” May 12, 2021 Hearing Tr., 37:16-22. In the interest of time, the Debtors intend to request the same of Your Honor at the status conference. After extensive consultation with various creditors, creditor groups, and the Sacklers, we will ask that Judge Chapman (Ret.) and Eric D. Green be appointed as joint mediators to mediate whether agreement can be reached on modifications to the Shareholder Settlement and the Plan in a manner consistent with the Supreme Court’s decision and the parties’ present positions. We understand that both co-mediators are ready to serve and commence service immediately should Your Honor agree.

We also wanted to inform Your Honor that the Debtors will today be filing a motion seeking an extension of the preliminary injunction to facilitate mediation. We believe this relief has very broad support among case parties.

We would appreciate a status conference on Tuesday, July 9th at 2:00 p.m. (prevailing Eastern Time) or at the Court’s earliest convenience thereafter.

Very truly yours,



Eli J. Vonnegut

Electronic Delivery